

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

Eletson Holdings Inc., *et al.*,¹
Debtors.

Chapter 11

Case No. 23-10322 (JPM)
(Jointly Administered)

**DEBTORS' REQUEST TO STAY DISCOVERY ON LEVONA HOLDINGS LTD.'S
CLAIM PENDING DETERMINATION ON THRESHOLD LEGAL ISSUES**

Debtors, Eletson Holdings Inc. (“Eletson Holdings”), Eletson Finance (US) LLC (“Eletson Finance”, and Agathonissos Finance LLC (“Agathonissos Finance” and, collectively, the “Debtors”), by and through their undersigned counsel, respectfully request that the Court (i) stay discovery pending the Court’s determination of threshold legal issues on Levona Holdings, Ltd.’s (“Levona”) Claim (Claim No. 21-1); and (ii) to set a briefing schedule regarding these issues. Debtors make this request for the reasons set forth in Debtors’ concurrently-filed Letter Opposition to Levona’s Motion to Compel, incorporated herein. Debtors propose filing affirmative briefs dismissing Levona’s Claim on May 31, 2024; with oppositions due June 10, 2024; and any reply on June 17, 2024. Debtors propose that oral argument may be heard at the hearing currently scheduled for June 18, 2024.

¹ The Debtors in these chapter 11 cases are: Eletson Holdings Inc., Eletson Finance (US) LLC, and Agathonissos Finance LLC. The address of the Debtors’ corporate headquarters is 118 Kolokotroni Street, GR 185 35 Piraeus, Greece.

Dated: May 22, 2024
New York, New York

Respectfully submitted,

REED SMITH LLP

/s/ Louis M. Solomon

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